

REMARKS

General:

Claims 1-14 are pending in the application. Claims 1-14 are rejected.

Specification:

The specification was objected to on the ground that claims 1, 7-8, 11, and 14 should have had line indentations pursuant to 37 CFR § 1.75(i). The accompanying listing of the claims restores the indentations present in those claims as originally filed, which were omitted from the listing filed on July 13, 2005.

Claim rejections – 35 USC § 103

Claims 1-14 were rejected as obvious over U.S. Patent No. 6,526,386 (Chapman et al.) in view of U.S. Patent No. 6,519,5678 (Harvey et al.)

Chapman shows a system for generating motor insurance renewal certificates FH1 and cancellation certificates FH4, in which a database 128, 132 of current insurance policies is maintained centrally. Renewal or cancellation information is entered remotely by an insurance agent 102 or by a finance company 208. Certificates or reports FHI, FH4, 110 may be printed centrally, or data for the printing of certificates or reports may be sent by the central office 122, 138 to one of the remote terminals, where a form processing and printing procedure 115, 116 is run locally.

Harvey shows a system and method for collecting, collating, and distributing large quantities of data from oil well wireline logging.

The present invention, as claimed in claim 1, provides a system for inputting and collecting insurance information from a plurality of remotely connected agents, said system comprising: a forms database, said forms database including completed insurance forms; a network server providing access to said forms database from a plurality of remotely located terminals; a data transfer server; and a formatting computer receiving individual client data and formatting forms with said received individual client information, completed forms being provided to said data transfer server.

The examiner contends that the databases 128 and 132 of Chapman constitute “a forms database, said forms database including completed insurance forms.” However, there is no disclosure or suggestion in Chapman that the databases 128 and 132 include completed forms. There is no disclosure or suggestion in Chapman that the databases 128 and 132 contain anything other than data in a database format.

The examiner contends that the remote terminal 104 connected to the central computer 124 of Chapman constitutes “a formatting computer receiving individual client data and formatting forms with said received individual client information, completed forms being provided to said data transfer server.” However, there is no disclosure or suggestion in Chapman that the central computer 124 formats forms and provides completed forms to another part of the system. The passages from Chapman cited by the examiner address only the physical connection between the remote terminal and the central computer, and do not address the functional capabilities of the central computer. The features are significant distinctions over Chapman, which provides for only storage of data, not formatted form data.

Harvey does not remedy the above deficiencies, and it is therefore submitted that the present invention, as claimed in claim 1, was not obvious over a combination of Chapman and Harvey.

The examiner acknowledges that Chapman does not have a data server, but asserts that it would have been obvious to include Harvey’s data server in Chapman’s system “with the motivation of providing a system that offers seamless delivery of real-time data from acquisition sites to delivery sites with an integration of all data streams.” With all due respect to the examiner, Chapman does not have “real-time data from acquisition sites” that need to be delivered “seamlessly,” and does not have “data streams” to be “integrated.” The most Chapman ever needs to deliver in one block is the information to fill out a certificate of motor insurance. There was no motivation to include Harvey’s data server in Chapman’s system, because Chapman does not need, and has no use for, the data-handling capacity that Harvey’s data server would provide. For this reason also, it is submitted that it would not have been obvious to combine Chapman and Harvey as the examiner proposes, and the present invention, as claimed in claim 1, was not obvious over a combination of Chapman and Harvey. Furthermore, to support an argument of obviousness, the motivation to

combine must be found in the prior art, and not in the applicant's invention. No motivation has been established for combining the features from Harvey with Chapman.

The present invention, in contrast to Chapman, includes a file server since the claimed system is designed to generate completed forms using data transmitted from the remote terminals. The resulting formatted data may be far larger than the blocks of data handled by Chapman's system. For example, the completed forms may be page images, as discussed at page 6, lines 15-19.

Claims 2-10 are dependent from claim 1 and, without prejudice to their individual merits, are deemed non-obvious over Chapman and Harvey for the same reasons as claim 1.

In addition, however, with reference to claim 3, as explained in the application at page 7, lines 12-15, an FTP server is most appropriate for very large files, such as page images of multi-page documents. That is even less appropriate for Chapman's systems, and the reasons for non-obviousness set out above apply even more strongly to claim 3 than they do to claim 1.

With further reference to claim 3, the examiner asserts that "data relating to automobile insurance policies" reads on "completed insurance applications." It is respectfully pointed out that an *application* for insurance is different from an issued *policy*. It is highly unlikely that Chapman's database of existing policies will contain the same information that is required in an *application* for insurance. It is certain that Chapman's database does not provide the information in the form of a completed application.

With reference to claims 3, 4, and 5, in Chapman's system the printing of certificates is either instigated by the central office 122, 138 or part of an interactive session between the central office 122 and the remote agent 102. It would not be appropriate to use an FTP server or e-mail server for sending out the print jobs, because both those sorts of data transfer server require a separate intervention by the remote agent to transfer the files to the print process 116, 118. Harvey discloses e-mail and FTP data servers for Harvey's purpose, but there is no motivation to introduce them into Chapman's system because they are inappropriate for Chapman's purpose.

With reference to claim 6, the examiner asserts that Chapman's databases 128, 132 include "client and new business information." The passage from Chapman cited by the examiner says only that policy status database 128 contains "data relating to automobile

insurance policies and their status vis-à-vis cancellation” and database 132 contains “data relating to main systems,” where “main systems” are defined as “software applications ... relating to other aspects of the insurance carrier’s business, such as underwriting and claims handling.” Even assuming for the sake of argument that some of the “data relating to automobile insurance policies” falls within the broadest reasonable interpretation of “client information” (which is not admitted), there is no suggestion in Chapman of storing “new business information.” On the contrary, Chapman’s system is concerned entirely with the renewal and cancellation of old business.

With reference to claim 7, neither Chapman nor Harvey discloses or suggests, and the examiner does not even allege that they disclose or suggest, “image generation means ... generating images of insurance policy forms” as required by claim 7. There is no disclosure or suggestion in the cited prior art of the system claimed in claim 7.

With reference to claim 8, there is no disclosure or suggestion in Harvey of “compressed files below a selected size being e-mailed over said e-mail server to a registered agent, said compressed file being included with said e-mail and, compressed files exceeding said selected size being stored on said FTP server” as required by claim 8. The examiner argues that Harvey provides an FTP server 122 and a notification server 123 that sends e-mail with optional attachments. However, which server to use is a choice for the user, see col. 18, lines 39-43, because different users have different needs and preferences, see col. 2, lines 22-40.

With regard to claim 9, the forms shown in Figs. 9 and 10 of Chapman are not insurance policy application forms or contact forms, as recited in claim 9, they are cancellation notices and renewal policies, see col. 7, lines 1-5. The forms shown in Figs. 9 and 10 of Chapman are not stored on a forms database or delivered through a data transfer server. The forms shown in Figs. 9 and 10 of Chapman are generated by print processes 116, 118 local to the printer. There is no disclosure or suggestion in Chapman of compressed image files of insurance policy forms being stored on said forms database and provided to said data transfer server “wherein said insurance policy forms include insurance policy application and contact forms” as required by claim 9.

With regard to claim 10, the examiner asserts that Chapman “teaches the claimed client data includes insurance policy application and contact data.” It is respectfully pointed

out that claim 10 recites "contract data" not "contact data." Further, while claim 10 does not enumerate the specific data, it is believed to be clear, when claim 10 is properly interpreted in the light of the specification, that the "insurance policy application and contract data" are data "providing sufficient information that includes whatever is necessary" to generate a complete application form and contract form. There is no suggestion that Chapman's database contains the necessary information. An application for insurance commonly requires a lot of information that would not be necessary for a system like Chapman's that merely has to monitor the status of existing policies.

For these reasons also, claims 3-10 are deemed non-obvious over Chapman and Harvey.

Claims 11-14 were rejected "for the same reasons set forth in claims 1-9."

Claim 11 is deemed patentable for at least the reasons given above in respect of claims 1, 6, 7, and 9. Claims 12-14 are dependent from claim 11 and, without prejudice to their individual merits, are deemed allowable as claims dependent from an allowable base claim. In addition, claim 12 is deemed patentable for at least the reasons given above in respect of claim 3. Claim 13 is deemed patentable for at least the reasons given above in respect of claims 4 and 5. Claim 14 is deemed patentable for at least the reasons given above in respect of claim 8.

Conclusion:

In view of the foregoing, reconsideration and withdrawal of the examiner's objections and rejections, and allowance of all of claims 1-14, is earnestly solicited.

Respectfully submitted,

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